

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JUAN REYES-CASTILLO,

Plaintiff,

UNITEDHEALTHCARE INSURANCE COMPANY

Involuntary Plaintiff,

v.

Case No. 22-CV-1320

CITY OF BROOKFIELD, JOHN WHITE,
BRANDON PIPP AND ANDREW STOCKLAND,

Defendants.

**DEFENDANTS CITY OF BROOKFIELD, JOHN WHITE,
BRANDON PIPP, AND ANDREW STOCKLAND'S
MOTION TO SEAL EXHIBIT K TO THE DECLARATION OF BRIANNA J. MEYER**

Defendants City of Brookfield, John White, Brandon Pipp, and Andrew Stockland (herein, the "City Defendants"), by their attorneys Crivello, Nichols & Hall, S.C., hereby move the Court, the Honorable Brett H. Ludwig, presiding, for an Order granting their Motion to Seal Exhibit K to the Declaration of Brianna J. Meyer. The City Defendants make this motion pursuant to Fed. R. Civ. P. 5.2(d) and General L. R. 79(d).

As further grounds, the City Defendants state:

1. Plaintiff has alleged the City Defendants violated his constitutional rights by utilizing excessive force and injuring his left shoulder and knee.

2. Simultaneous with this Motion to Seal, the City Defendants are filing a Motion for Summary Judgment on each of Plaintiff's claims.

3. In support of the Motion for Summary Judgment, the City Defendants have drafted a Proposed Findings of Fact, which generally outlines various pertinent medical records of Plaintiff, but the records themselves are confidential medical records that should remain under seal.

4. The subject records include intimate treating details, including but not limited to various medications prescribed to Plaintiff.

5. To be sure, federal laws are in place to ensure the privacy afforded to patients. See, *e.g.*, Health Insurance Portability and Accountability Act of 1996.

WHEREFORE, the City Defendants request the Court grant this Motion to file Exhibit K to Brianna J. Meyer's Declaration under seal pending any motion from Plaintiff to unseal the medical records.

Dated this 1st day of December, 2023.

CRIVELLO, NICHOLS & HALL, S.C.
Attorneys for Defendants, City of Brookfield,
John White, Brandon Pipp and Andrew
Stockland

By: /s/ Brianna J. Meyer
STEVEN C. MCGAVER
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BRIANNA J. MEYER
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